

FILED 29 AUG '14 14:49 USDC-ORE

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

Joseph Matthew Waite*(Enter full name of plaintiff(s))***Plaintiff(s),****v.**University of Oregon*(Enter full name of ALL defendant(s))***Defendant(s).**

Civil Case No. 6:14-cv-01400-MC
(to be assigned by Clerk of the Court)

COMPLAINT**Jury Trial Demanded**☒ **Yes**☐ **No****I. PARTIES**

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

PlaintiffName: Joseph Matthew WaiteStreet Address: 3402 Kingsrow Ave. Apt. 6City, State & Zip Code: Eugene, Oregon 97401Telephone No. 716-864-4462

Please send a duplicate of any and all Court notifications to:

Richard and Marjorie Waite (Joseph's parents)

125 Woodward Ave.

Buffalo, New York 14214

Defendant No. 1 Name: University of Oregon
Street Address: 1585 East 13th Ave
City, State & Zip Code: Eugene, Oregon 97403
Telephone No. 541-346-1000

Defendant No. 2 Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No. _____

Defendant No. 3 Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No. _____

Defendant No. 4 Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No. _____

II. JURISDICTION

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. A case involving the United States Constitution or federal laws or treaties is a federal question case. A case in which a citizen of one state sues a citizen of another state and the amount in damages claimed is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction (*check all that apply*)

☒ Federal Question

☐ Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory, or treaty right is at issue?

Title IX No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.

Also: Freedom of Speech; as protected by law under the First Amendment to the U.S. Constitution.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state of citizenship _____

Defendant(s) state(s) of citizenship _____

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Joseph M. Waite has been the victim of a Title IX violation perpetrated by University of Oregon employees. He has been banned from registering for further classes at the UO, effectively excluding him from an education program or activity receiving federal financial assistance on the basis of sex, his gender; which is male, his sexual orientation; which is hetero-normal sexuality, his ethnicity, or race; which is white caucasian, and his chosen field of study; which happens to be Chinese Language, Japanese Language; East Asian Languages and Literatures.

Joseph Waite is in possession of documentation given to him by University of Oregon employees that can prove these statements in a court of law.

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

The involved parties who perpetrated crimes against Joseph Waite include employees of University of Oregon's American English Institute (AEI), Individuals at the UO's Office of Equal Opportunity and Affirmative Action, as well as employees of the UO's Office of the Dean of Student Conduct including: Paul Shang, Carl Yeh, and Chicora Martin.

These crimes were perpetrated against Joseph Waite over a sustained period of time, from an unspecified date starting as early as 2006 until as recently as March 2014 and continuing to affect his life today as he is currently being excluded from participation in an educational program funded by the federal government; which constitutes a clear Title IX violation.

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

The Title IX violation has resulted in defamation of his character, subsequent loss of future job opportunities and income; and are a direct result of the slanderous and libelous allegations fabricated by University of Oregon employees.

* For the description of how each party was involved please refer to the attached documents.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

The University of Oregon is to release the registration held on Joseph Waite's student account; allowing him to register for post bachelor classes to continue his education and personal development unhindered.

Joseph Waite is seeking restitution from the University of Oregon in the amount of one million dollars for the Title IX violation, which has resulted in defamation of his character, subsequent loss of job opportunities and income, directly resulting from the slanderous and libelous allegations fabricated by University of Oregon employees.

Furthermore any Eugene Police Records of Joseph Waite's personal records that have been affected by this case such as "public indecency" or "public threat" are to be expunged.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 26th day of August, 2014.

Joseph Matthew Waite
Joseph Matthew Waite
(Signature of Plaintiff(s))